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April 26, 2013

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Room TW-A325
Washington, DC 20554

Re: Petition of Pioneer Telephone Cooperative, Inc. for Waiver of 47 C.F.R.
Section 36.3, 36.123-126, 36.141, 36.152-57, 36.191 and 36.372-382 to
Unfreeze Part 36 Category Relationships, CC Doc. No. 80-286,
Ex Parte Notice

Dear Ms. Dortch:

On April 24, 2013 Jim Eaton, Nick Kretchmar, Sharon Minor, Jo Shotwell and I, all representing Pioneer Telephone Cooperative, Inc., met with Lisa Gelb, Wesley Platt, Dan Ball and Don Sussman of the Wireline Competition Bureau to discuss the above cited waiver petition. Ms. Minor and Messrs. Eaton and Kretchmar participated by telephone.

The Pioneer representatives acknowledged that the issues raised in the Petition are before the Joint Board, but expressed concern that the proceeding has experienced substantial delays and that with no definitive time for Joint Board action, and then further time for Commission action, the cost to revenue mismatches it is now experiencing will undoubtedly have grown substantially worse.

Pioneer noted that its service area and expense characteristics are similar or greater than that of the ILEC that was granted a similar waiver in 2012, that it made major investments between 2001 when categories were frozen through 2012, mostly to provide special access and DSL services. Much of the special access investment was made to meet demand for service to cellular mobile service towers. There is very little competition for broadband service from cable companies in the area, most competition is from mobile carriers.

Pioneer agreed to develop and provide further information in response to staff questions regarding its investment decisions from 2005 forward.

Please address any questions in this matter to me.

Sincerely yours

David Cosson

Counsel to Pioneer Telephone Cooperative, Inc.

cc: Lisa Gelb
Wesley Platt
Dan Ball
Don Sussman